

## **EXHIBIT 2**



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

May 5, 2010

**BY FEDEX**

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**Re: United States v. Paul Greenwood and Stephen Walsh,  
09 Cr. 722 (MGC)**

Dear Counsel:

This letter provides additional discovery pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure ("Fed. R. Crim. P.").

**Disclosure By the Government**

Based on your requests for discovery in this case, we write to advise you of the following:

1. As we indicated in Court on February 4, 2010 and again on April 21, 2010, there are approximately 80 boxes in our possession that originated from WG Trading Company's offices located in Greenwich, CT, Jersey City, NJ and North Hills, NY. You have previously been provided with indexes of these materials. These materials have been available for your review through the Receiver since the Government's initial production of discovery on August 20, 2009. They have been available for your review in New York since we advised you in Court on February 4, 2010 that they were in New York. Please contact me if you wish to arrange a time to review these materials. If you wish to make copies of these materials, we will work with your vendor to facilitate that process.
2. We are enclosing an inventory of boxes and other materials in the possession of the Receiver. Please contact me if you wish to arrange a time to review these materials. As we have previously indicated in Court, the Westridge boxes were stored in California in the ordinary course of business, and we do not plan to move them to New York. Moreover, based upon our initial review of these documents, it does not appear that they

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are subject to production pursuant to Fed. R. Cr. P. 16. Nevertheless, they have been available for your review since August 2009.

3. We enclose an index to various computer data that is in the Receiver's possession. We are providing two computer hard drives that contain this data, with the exception of the files related to J. Carder, M. Yeager, M. Murdoch, and K. Snyder. With respect to that data, we will investigate the location of those materials with the Receiver, and will produce whatever responsive material we identify.

The Government recognizes that its obligation to provide discovery is of a continuing nature, and the Government will supplement this response if it obtains additional evidence and materials.

Sentence Reduction for Acceptance of Responsibility

Please be advised that this Office will oppose both the two-point reduction under the Sentencing Guidelines for acceptance of responsibility, U.S.S.G. § 3E1.1(a), and the additional one-point reduction available for defendants who plead prior to the Government's initiation of trial preparations, U.S.S.G. § 3E1.1(b)(2), in the event your client has not entered a plea of guilty two weeks prior to trial. We will follow this policy whether or not suppression or other pretrial motions remain outstanding after this date and even if the trial date has not been announced by the Court two weeks in advance of the trial.

Please contact us at your earliest convenience concerning the possible disposition of this matter or any further discovery which you may request.

Very truly yours,

PREET BHARARA  
United States Attorney

By:

  
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**WGTC & WGTI****Storage - New York**

Boxes in storage based on Pre-Receiver's list (at inception of Receivership)	185
Greenwich moved to storage (Post Receivership)	47
Greenwich moved to storage (Post Receivership)	3
Jersey City moved to storage (Post Receivership)	42
Long Island moved to storage (Post Receivership)	59
Boxes moved to CA from Pre-Receiver's list	(16)
3 of the 47 boxes from Greenwich moved to CA	(3)
3 of the 3 boxes from Greenwich moved to CA	(3)
Total boxes in storage, New York	<u>314</u>

**Contact Information**

Company: Morgan Manhattan  
Address: 11 Labriola Court, Armonk, NY 10504  
Telephone: (914) 273-3800 X102  
Fax: (914) 273-5073  
Contact: Douglas Spelman

**Note:** Of the 47 boxes, 2 boxes contain computers: 1 box has 2 computer towers and the other box has 1 computer

**Boxes in CA**

Boxes moved to CA from Pre-Receiver's list	16
3 of the 47 boxes moved to CA	3
3 of the 3 boxes moved to CA	3
Total boxes in CA	<u>22</u>

**Westridge - Santa Barbara (at Receiver's Office)**

Inventoried	110
Not inventoried	152
Total boxes from Santa Barbara	<u>262</u>
Computers	<u>6</u>

**Computers**

Long Island	18
Jersey City	3
Total computers	<u>21</u>

**Contact Information**

Company: Constructure Technologies, LLC  
Address: 425 Broad Hollow Road, Suite 304, Melville, NY 11747  
Telephone: (631) 396-7777  
Fax: (631) 396-7780

Size of WG Trading & Westridge Archive Drive Folders – REA LLC

\\DDuffy\_NewBox\  
Total file size 9,099,265 KB

\\DDuffy\_Solomon\  
Total file size 7,258,272 KB

DDuffy\_Archive AIP file  
Total file size 1,498,221,999

\\Grand Central\_Ponies\  
Total file size 5,502,665 KB

\\Paul\_Greenwood  
Total file size 7,450,969 KB

\\Smarsh\_Email\_WG Trading\  
Total file size 21,345,333 KB

\\WCM\_Alberta\  
Total file size 33,996 KB

\\WCM\_Bob\  
Total file size 15,798,306 KB

\\WCM\_Bob\_2\  
Total file size 3,388,125 KB

\\WCM\_Carol\  
Total file size 234,768 KB

\\WCM\_Nancy\  
Total file size 299,375 KB

\\WCM\_RoseAnn\  
Total file size 2,085,978 KB

J. Carder 1  
Total file size 1,228,327 KB

J Carder 2  
Total file size 1,488,522 KB

M. Yeager 1

Total file size 1,832,211 KB

M. Yeager 2

Total file size 4,141,623 KB

M. Murdoch

Total file size 2,773,827 KB

K. Snyder

Total file size 7,174,904 KB